



November 30, 2017

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment,
WC Docket No. 17-84**

Dear Ms. Dortch:

On November 28, 2017, several members and representatives of the Power and Communication Contractors Association (PCCA) met with several representatives from the Federal Communications Commission (FCC), including Amy Bender, Wireline Advisor to Commissioner Mike O'Reilly, Travis Litman, Wireline Advisor to Commissioner Jessica Rosenworcel, Claude Aiken, Legal Advisor and Wireline Advisor to Commissioner Mignon Clyburn, Jay Schwarz, Wireline Advisor to Chairman Ajit Pai, and Jamie Susskind, Wireline Advisor to Commissioner Brendan Carr.

Representing PCCA were Todd Myers, KG Myers Construction; Rex Schick, KW Underground; Robin Gilbertson, J&R Underground; Steve Sellenriek, Sellenriek Construction; John Fluharty, Mears Group; John Hale, John Deere; Daryl Bouwkamp, Vermeer Corp; and Eben Wyman, Wyman Associates. PCCA represents contractors, manufacturers, and distributors who build and repair America's power and communications infrastructure, including electric transmission, distribution, and substation facilities and broadband, telephone, and cable television systems.

Discussion focused on PCCA's opinions on one-touch make-ready as a practice and proposed policy, and we revisited some of PCCA's positions submitted in comments responding to FCC's *Notice of Inquiry on Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment (FR Vol. 82, No. 90 22000)*.

To deploy broadband most efficiently, PCCA believes FCC should focus on building fiber-based infrastructure and avoid repairing antiquated copper systems and becoming mired with bureaucratic hurdles that continue to obstruct effective broadband deployment. Failure to replace old copper systems is by far the biggest impediment to effective and sustainable broadband deployment and is inconsistent with Chairman Pai's goal of making the most of taxpayer dollars.

One issue that has gained attention is known as one-touch make-ready (OTMR), which allows attachers and pole owners to use a contractor or set of contractors, approved by pole owners, to coordinate and do all work related to a new attachment. Under a OTMR policy, new attachers could use a single or set of pole-owner-approved contractors to complete all of the work in a coordinated timeframe in lieu of

several crews to perform sequential make-ready work on a given pole. Attachers seeking to add a new attachment through the optional one-touch-make-ready process would select a contractor or set of contractors approved by the pole owner to perform surveys, make-ready estimates, and make-ready work. OTMR avoids multiple truck rolls, expedites the attachment process, and can reduce disruptions to consumers.

PCCA takes issue with certain comments submitted to FCC's proposed rule, *Accelerating Wireline Broadband Deployment to Infrastructure Investment (FR Vol. 82, No. 89 21761)*, regarding the role contractors play in the construction of broadband systems, including the safety of contractor work. Some commenters expressed that damage to broadband facilities are likely to result from work new attachers because their contractors are not generally familiar with existing attacher's networks and service quality standards. Commenters added that these concerns are compounded by the fact that many new attachers are likely to be competitors of the existing attachers, and contractors will have little economic incentive to work safely around existing equipment on poles.

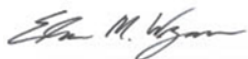
PCCA informed FCC that the vast majority of broadband construction is contracted out, and that PCCA represents 85 percent of the construction companies performing this work. Safety is paramount in contractor operations, and PCCA contractors perform quality work for all carriers large and small, urban and rural. PCCA believes that debate about OTMR is based on timing and efficiency, not safety. Attacks on contractor performance seem to be veiled attempts by existing attachers to obstruct access to poles that include their facilities. In some cases, existing attachers seem to use delay tactics to keep the competition out. Again, PCCA believes these conflicts are about timing and access to poles, not whether contractors perform safe work.

While PCCA does not have an official position on OTMR policy, we believe OTMR can be, and already is performed in the field safely and efficiently. In fact, OTMR work could be considered safer in some cases when a limited number of experienced contract personnel perform the work. PCCA's goal in these discussions was to inform FCC that shortsighted comments questioning contractor performance is unwarranted and unsubstantiated. If conducted properly, OTMR can provide quality construction of new broadband and power attachments safely more efficiently and expeditiously than traditional processes by avoiding multiple crews and bureaucratic hurdles.

PCCA also reiterated the association's position that to effectively deploy broadband, FCC should do everything possible to encourage use of fiber-based infrastructure and avoid repairing antiquated copper systems. Further, PCCA believes FCC should pursue "future proof" broadband speeds of 100/100 Mbps to allow use of technology needed for technological advancements that allow better communication through telematics and meet demand for the simultaneous use of multiple mobile devices in businesses, schools, hospitals, first responders, and American homes today and in the future.

Please feel free to contact me at (703) 750-1326 or at eben@wymanassociates.net if you have any questions regarding these matters.

Regards,



Eben M. Wyman
Principal, E. Wyman Associates, LLC